

James Q. Taylor-Copeland (284743)
james@taylorcopelandlaw.com
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Marc M. Seltzer (54534)
mseltzer@susmangodfrey.com
Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
oelkhunovich@susmangodfrey.com
Krysta Kauble Pachman (280951)
kpachman@susmangodfrey.com
Nicholas N. Spear (304281)
nspear@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

P. Ryan Burningham (*pro hac vice*)
rburningham@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800 Seattle, WA
98101 Telephone: (206) 516-3880
Facsimile: 206) 516-3883

Attorneys for Lead Plaintiff Bradley Sostack

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 18-cv-06753-PJH

This Document Relates To:
ALL ACTIONS

**DECLARATION OF NICHOLAS N.
SPEAR IN SUPPORT OF STIPULATION
AND [PROPOSED] ORDER TO EXTEND
TIME OF MOTION FOR RELIEF FOR
GSR HOLDINGS, INC. [PURSUANT TO
L.R. 6-2(a)]**

1 I, Nicholas N. Spear, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California, an associate
3 with the law firm of Susman Godfrey L.L.P., and counsel of record for Lead Plaintiff Bradley
4 Sostack. I have personal knowledge of the facts set forth herein, and if called as a witness, would
5 testify competently thereto.

6 2. Pursuant to Northern District of California Civil Local Rule 6-2(a), I make this
7 declaration in support of the “Stipulation and [Proposed] Order to Extend Time of Motion for
8 Relief for GSR Holdings, Inc.”

9 3. On April 28, 2022, the Court issued an order requiring that Defendants Ripple Labs
10 Inc, XRP II, LLC, and Bradley Garlinghouse (collectively, “Defendants”) produce “all documents
11 and written discovery produced in *Securities and Exchange Commission v. Ripple Labs, Inc.*, 20
12 Civ. 10832 (AT), S.D.N.Y) (the “SEC Action”).” Dkt. 167 (the “Order”).

13 4. Also pursuant to this Order: “Within seven (7) days of the issuance of this order,
14 Plaintiff must provide notice to all third parties who have not consented to production pursuant to
15 section 9 of the protective order in this action and paragraph 23 of the protective order in the SEC
16 Action, along with a copy of this order. Any third party who does not consent to production must
17 notify both Plaintiff and Defendants of their intent to object within fourteen (14) days of receipt
18 of such notice, and must file any motion for relief from this Court within twenty-one (21) days of
19 receipt of such notice. Prior to the filing of any request for relief from this Court, the moving third
20 party must meet and confer with Plaintiff in good faith.” *Id.*

21 5. Plaintiff provided notice to third party GSR Holdings, Inc. (“GSR”) on May 4, 2022.
22 GSR provided its notice of intent to object on May 17, 2022. Pursuant to the Order, any motion
23 for relief from GSR was due on May 25, 2022.

24 6. After meeting and conferring over telephone and email, the parties filed a stipulation
25 to extend the deadline for any motion for relief until June 2, 2022, which the Court granted. *See*
26 Dkt. 172, 174.

27 7. Plaintiff’s counsel and counsel for GSR have continued to meet and confer about
28 the documents GSR will produce.

1 8. Plaintiff believes that additional meeting and conferring may obviate or limit the
2 need for relief from the Order. Based on communications with GSR's counsel, Plaintiff
3 understands that GSR also believes that additional time for meeting and conferring is warranted.

4 9. The parties therefore stipulated to an extension of the time for GSR to file a motion
5 for relief from June 2, 2022 to June 24, 2022, and request a Court order entering the stipulation
6 pursuant to Local Rule 6-2.

7 10. Pursuant to Local Rule 6-2(a)(2), Plaintiff and Defendants have previously
8 requested four modifications to the case schedule since the Court issued its Pretrial Order (Dkt.
9 125). *See* Dkts. 157, 169, 171–72. The first was granted as modified by the Court. *See* Dkt. 158.
10 The second, third, and fourth were similar requests for extensions of the deadline for a motion for
11 relief in the Order, all of which were granted. *See* Dkts. 169–74. GSR has previously requested
12 one time modification. *See* Dkt. 172.

13 11. The extension requested by the parties will not affect the case schedule.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed this 2nd day of June, 2022, at Los Angeles, California.

17
18 /s/ Nicholas N. Spear

Nicholas N. Spear

nspear@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067-6029

Telephone: 310-789-3100

Facsimile: 310-789-3150